

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

UNIVERSAL CONNECTIVITY
TECHNOLOGIES INC.,

Plaintiff,

v.

LENOVO GROUP LIMITED,
Defendant.

Case No. 2:23-cv-00449-JRG

JURY TRIAL DEMANDED

**PLAINTIFF'S UNOPPOSED MOTION FOR LEAVE TO EXCEED PAGE LIMITS
FOR EXHIBITS IN SUPPORT OF MOTION TO ENFORCE
LENOVO'S COMPLIANCE WITH MOTION TO COMPEL**

Plaintiff Universal Connectivity Technologies Inc. (“UCT”) respectfully files this Unopposed Motion for Leave to Exceed Page Limits for Exhibits in Support of UCT’s Motion to Enforce Lenovo Group Limited’s Compliance with Motion to Compel. *See* Dkt. No. 84. In support of UCT’s Motion to Enforce, UCT submitted Exhibit 1, which is an excerpted version of UCT’s First Set of Interrogatories to Lenovo, and an attorney declaration, to comply with the Court’s Discovery Order in this case. Dkt. No. 26 at ¶ 9.b.

UCT now seeks to provide the Court with four additional exhibits including email communications between the parties referenced in UCT’s Motion to Enforce. Good cause supports UCT’s request, as it would benefit the Court to have the email correspondence for reference in deciding UCT’s Motion. Accordingly, UCT respectfully requests leave to file the Declaration of Ashley Ratycz and corresponding Exhibits 1-5, which collectively comprise 17 total pages.

Dated: January 29, 2025

Respectfully submitted,

By: /s/ Brett Cooper
Brett E. Cooper (NY SBN 4011011)
bcooper@bc-lawgroup.com
Seth R. Hasenour (TX SBN 24059910)
shasenour@bc-lawgroup.com
Jonathan Yim (TX SBN 24066317)
jyim@bc-lawgroup.com
Drew B. Hollander (NY SBN 5378096)
dhollander@bc-lawgroup.com
Ashley M. Ratycz (IL SBN 6330321)
aratycz@bclgpc.com

BC LAW GROUP, P.C.
200 Madison Avenue, 24th Floor
New York, NY 10016
Telephone: (212) 951-0100

Andrea L. Fair (TX Bar No. 24078488)
MILLER FAIR HENRY, PLLC
1507 Bill Owens Parkway
Longview, TX 75604
Telephone: (903) 757-6400
andrea@millerfairhenry.com

*Attorneys for Universal Connectivity
Technologies Inc.*

CERTIFICATE OF SERVICE

I certify that this document is being served upon counsel of record on January 29, 2025 via electronic service.

/s/ Brett Cooper
Brett Cooper

CERTIFICATE OF CONFERENCE

Counsel for both parties complied with the meet and confer requirements of Local Rule CV-7(h) on January 29, 2025 and counsel for Lenovo Group Limited is unopposed to Plaintiff's motion.

/s/ Brett Cooper
Brett Cooper